

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TAWANDA WEATHERSPOON]

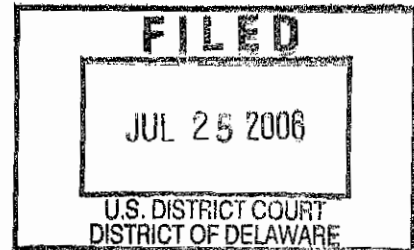
Plaintiff,]

C.A. No. 06-009-KAJ

vs]

DETECTIVE MARZEC,]
TOWN OF DELMAR,]
MARVIN MAILEY, AND]
CITY OF DOVER, AGENT]
TOM JACOBS, AGENT]
CHRIS QUAGLINO and]
DRUG ENFORCEMENT]
AGENCY]

Defendants,]



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AMENDED COMPLAINT

Now Comes the plaintiff, Tawanda Weatherspoon, pro se, who so moves the Honorable Court, pursuant to Fed. Rule Civ. Pro. 15 and in support of the same the following is asserted:

(1). It is a common policy of towns [Town of Delmar] and cities [City of Dover] to allow certain officers to work undercover with DEA. but (a) these officers are still their employees (b) they still utilizes that Town or City's badge of authority and (c) while working DEA operations they use the 'badge of authority' of that Town or City, to obtain warrants, make arrests and file documents in Courts using that Town or City's Police Department as the Arresting Agency.

a. All this is done with 'full' knowledge , understanding and authorization of the same by that Town [Town of Delmar] and City [City of Dover] and they are wholly responsible for damages claimed By plaintiff this is more than a 'casual link' in this matter.

(2). Tawanda Weatherspoon, has suffered greatly at the 'hands' of Det. Marzec and his fellow officers, and their actions has violationed her rights under 4th Amendment Illegal Search and Seizure as well transgression upon 14th Amendment rights of Due Process and Equal Protection of the Law.

White vs Marzec, et al., C.A. 06-009-KAJ

a. Ms Weatherspoon's house was searched and numerous things' seized, including her business records and receipts as well as her vehicle a 1999 Dodge Durango (a). She was never charged or suspected of any crime and (b). her vehicle was never connect to or suspected in any crime. and seized, because of Marzec's 'poor training' and supervision and Officer Marvin Mailey was the main culprit of this violation, because he co-authored Marzec's and fellow Officers actions that created the abuse and the City of Dover, is responsible for his 'poor training and supervision' All that occurred on 08-21-05 could have been avoided.

b. First and foremost Marzec and Officer Marvin Mailey and their other fellow Officers should have never been Lincoln Delaware residence, because their search warrant was for a (a) single wide tan and white mobile home (b) the warrant authorized searches and seizure in Ellendale Delaware and © The Home in Lincoln, Delaware is a doublewide and Brown in color and such a home exist in Ellendale Delaware and many picture of it are in Court record. Pembaur v. Cincinnati, 475 U.S. 469

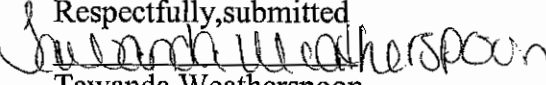
c. The Town of Delmar, has even allowed it Police Chief Hal Saylor to participate in these type of actions. (a) this is a 'show' of "deliberate type of conduct" and signifies they are a "moving force" in the actions of their subornated. Monell v. New York City Dept., of Social Servs 436 U.S. 658

The failure to train and supervise Marzec and Officer Marvin Mailey, falls directly upon the Town of Delmar and City of Dover as well as their fellow officer participating in the convert DEA action. (a). what Marzec and Officer Marvin Mailey and their fellow officers did on 09-21-05, violated the civil rights of Ms White and shows the 'deliberate indifference' to substain this "cause of action" against the Town of Delmar and City of Dover, because if 'properly trained' Marzec and Officer Marvin Mailey, would have known policemen just don't search and seize at a location that (a) the search warrant doesn't authorize (b) don't search and seize a location that a judge hasn't authorized and (c).Know the difference from Lincoln and Ellendale after a three month investigation and not lie about it. Canton v. Harris, 489 U.S. 378

(3). When as in 'instant' case the policy and custom of Town of Delmar and City of Dover, which allows Det Marzec and Officer marvin Mailey and other fellow Police Officers to work undercover with DEA and run all over the State utilizing the 'badge of authority' of that Town or City and inflict pain [emotional and physical] wwhile violating the civil

rights as well constitutional rights of Weatherspoon as well as deprivation of the same makes them and their municipality liable subsection 1983. Springfield v Kibble, 480 U.S. 257 at 267 and the Town of Delmar and the City of Dover, should and can be made to answer to this abuse.

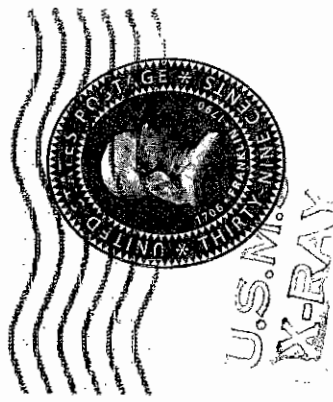
July 14, 2006''

Respectfully, submitted

Tawanda Weatherspoon
9008 Green Top Rd
Lincoln, DE. 19960

So Order this __th day of _____, 2006, the Town of Delmar and the City of Dover, shall be named as defendants and respond to Complaint against Them.

U.S. District Court Judge Kenneth A. Jordan

With my signature, I Tawanda Weatherspoon, verify service of the Attached document, upon, Mr. Seth M. Beausang, Esq., Asst. U.S. Attorney General at 1007 Orange St. Suite 700, Wilmington, DE. 19801 and Mr. Daniel A. Griffith, Esq., at 1220 Market St. 5th Floor, Wilmington, DE. 19801, on this _14_ th day of July 2006,



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